



Home Office

# **TIER 4 STUDENT CREDIBILITY PILOT**

## ANALYSIS OF QUANTITATIVE AND QUALITATIVE DATA

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# Executive Summary

## ***About the pilot***

The Tier 4 pilot was designed to analyse the value of interviewing to the current Points Based System (PBS) application process for Tier 4 student visas, and the case for introducing an additional power of refusal for UK Border Agency officials in this route. The pilot ran from December 2011 to February 2012 and asked Agency Entry Clearance Officers (ECOs) in a number of overseas posts to interview a sample of applicants and record data on refusals after interview under existing powers, as well as potential additional reasons for refusal. Short questionnaires were sent out to posts at the end of the pilot, to provide some additional qualitative information. Telephone discussions were also conducted with a selection of posts, to explore issues raised in applicant interviews and data collected from ECOs.

Data was collected on 2,316 interviews from 13 posts (Bangladesh, Burma, China, Colombia, Egypt, the Gulf, India, Kenya, Nigeria, Pakistan, Philippines, Sri Lanka and USA/Canada).

There was an approximate 60:40 split between high and low risk applicants interviewed during the pilot<sup>1</sup>. The identification of the high risk group was carried out in each post by the Risk and Liaison Overseas Network (RALON), using local risk profiling. Low risk interviewees were identified on a random basis.

Applicants from a total of 47 countries were interviewed during the pilot period, with just over half coming from Pakistan (31%) and India (22%). Most interviewees were male and aged between 21 and 29 at the time of interview (62%). Applications were generally made to one of three institution types: privately funded FE/HE colleges (45%), universities (33%) or publicly funded colleges (14%). Course types varied, but over a quarter applied for business administration / management courses (28%) and roughly half of interviewees had applied to study for between one and two years (49%).

## ***Decisions made using existing Tier 4 PBS rules***

ECOs were asked to assess interviewees against existing Tier 4 PBS rules before considering an applicant's potential credibility. Just over a sixth (17%) of applicants interviewed were refused using existing Tier 4 PBS rules. Some applicants could have been refused on papers alone. For others, such as those lacking basic English language competence, refusals were only possible on the basis of an interview.

More than twice the proportion of all high risk interviewees (22%) were refused on existing powers compared to low risk interviewees (10%). Of the 13 posts, Burma (45%) and Bangladesh (38%) had the highest refusal rates on existing powers, while USA/Canada (4%) and Pakistan (6%) recorded the lowest.

The most common reasons for refusal were maintenance and English language. More than one third (34%) of refusals in all posts were made on maintenance grounds, with applicants unable to satisfactorily prove they had adequate funds or had been in possession of them for the correct amount of time, or because they had submitted incorrect or fraudulent documentation. More than one fifth (24%) of refusals were made on the basis of English language ability. Data highlighted concerns over the number of applicants in possession of an approved English language testing certificate who were unable to answer basic interview questions without the aid of an interpreter.

## ***Results from credibility testing***

The pilot enabled ECOs to test the intentions of some applicants. Only once all existing PBS rules had been applied and a decision to grant or refuse had been made were ECOs asked to assess applicants who had already been granted a visa. They tested potential credibility based on applicants' intention to study their proposed course, intention to leave the UK at the end of the course,

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<sup>1</sup> High risk applicants were more likely to be targeted for interviews, but it was also important to include a random sample, drawn from low risk applicants (i.e. those not normally brought to the attention of an ECO), as a control group to enable full analysis of the pilot and the impact of current risk profiling.

ability to maintain themselves and their dependants for the duration of the course, and ability to study the proposed course.

The data shows that ECOs could potentially have refused 32 per cent of those visas granted in this study on the basis of applicants' credibility<sup>2</sup>. The rate of potential credibility refusals varied across posts and some (Bangladesh, Burma, India, Nigeria, Pakistan, Philippines, Sri Lanka) had a higher rate than the weighted average.

During this pilot, ECOs did not have the power to refuse applicants they deemed to lack credibility; instead they were asked to record detailed information on those they felt they could potentially refuse on these grounds, if the power was available to them. These were hypothetical refusals, as a visa had already been granted under existing PBS rules. Discussions with posts suggest that, in reality, ECOs would be more inclined to approve than refuse an application in a borderline case. Therefore these figures should be treated as upper estimates. In reality we would expect smaller numbers of potential refusals on credibility grounds than those captured as part of the pilot.

In order to obtain an accurate representation of the data and account for some categories where there were only a small number of cases, it is important when interpreting the results from the pilot to read rates and sample sizes together.

Around three in five applicants to privately funded FE/HE colleges (61%) could potentially have been refused on credibility grounds after interview, compared with around one in seven (14%) applicants to universities. During the pilot, rates of potential refusals on credibility grounds were high for diplomas (56%), business/administration courses (48%) and banking/finance related courses (42%) - particularly those offered by private colleges.

Genuine intention to study and intention to leave the UK were seen by ECOs as the two most important elements in assessing potential credibility. They felt that ability to study could only be properly judged by sponsoring institutions and while content with existing maintenance requirements, considered that there was scope to explore at interview whether applicants were genuinely able to maintain themselves for the duration of their course.

More than three quarters of potential refusals on credibility grounds referred to applicants' intention to study (88%). Indicators of potentially less credible students included:

- a poor academic background (including elongated gaps in studies);
- a lack of knowledge about the course or institution;
- lack of academic progression offered by the course; and
- any undue influence from third parties when choosing courses or institutions.

More than three quarters (85%) of potential refusals on credibility grounds also referred to applicants' intention to leave the UK at the end of their course. This was not something that could be assessed on papers alone and interviews highlighted the following indicators of intention to remain in the UK:

- individual's economic circumstances (push and pull factors);
- applicants' plans on completion of studies;
- links with the UK, including family and friends; and
- links with country of origin, including family and business interests.

Maintenance was identified by ECOs as a more significant issue in the Indian subcontinent than elsewhere. Increased interviewing and credibility testing could enable ECOs to make a better assessment of whether applicants have sufficient funds to support themselves for the full duration of their course, and the source of their funds.

## ***Interview process***

ECOs were provided with a standard format for interviews, but were given flexibility to deviate from this as they felt appropriate. Interviews took place in the native language of the applicant, but

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<sup>2</sup> Weighted average. Overall percentage was weighted to take into account the fact that over half of all interviews took place in India and Pakistan. The weighted percentage provides a more accurate representation of overall impact across all posts.

contained some questions designed to test their English language ability. The majority (73%) were conducted face-to-face, with the remainder conducted over the telephone, where face-to-face interviews were not possible.

Interviews took an average of around 30 minutes across all posts and telephone interviews generally took longer than those conducted face-to-face. The highest average interview length was in USA/Canada (54 minutes) and the shortest in Colombia (13 minutes). Increased interviewing negatively impacted on the productivity of some posts, with ECOs in Pakistan suggesting that the end to end application process took up to five times longer in some cases during the pilot than under normal circumstances.

# 1 Introduction

This report sets out the results of a pilot to interview Tier 4 student visa applicants. The pilot was developed to test the effectiveness of interviewing Tier 4 applicants at the entry clearance stage, and assess the requirement for, and design of, possible additional powers of refusal in this visa category. It ran from December 2011 to February 2012. Entry Clearance Officers (ECOs) were asked to interview a sample of applicants and record information on these interviews using an online survey tool.

Section 1 provides background information on the current Tier 4 process. Section 2 explains how the pilot worked, including the methodology used and information on interviewees. Section 3 gives details of visa refusals under the pilot using existing PBS rules, and section 4 sets out the results of credibility testing undertaken during the pilot. Finally, section 5 looks at issues around the interview process under the pilot. The Appendices contain additional details of the pilot methodology, profiles of decisions made in posts, some applicant case studies, and a summary of ECOs' views on the potential benefits and challenges of increased interviewing and credibility testing.

## 1.1 *The current Tier 4 PBS process*

The UK operates two routes for non-European nationals to come to the UK for the purpose of study. To enter under Tier 4 of PBS, the student must apply for entry clearance overseas, having been issued a Confirmation of Acceptance for Studies (CAS) by an education provider that is registered as a Tier 4 sponsor. Students must meet the Tier 4 criteria including minimum English language requirements, and can in certain circumstances work, bring dependants and extend their stay in the UK. Students coming for less than six months may instead choose to come through the student visitor route, which does not require formal sponsorship. Student visitors are not able to work, bring dependants or extend their stay in the UK.

An intentions test, under which an applicant must satisfy the UK Border Agency that he or she is a genuine student who intends to return overseas before the expiry of his or her visa, operates in the student and other visitor routes, but does not exist within the Tier 4 rules. Student applicants are not routinely interviewed and Tier 4 sponsors are expected, as part of their sponsor obligations, to ensure the student is able to and intends to study the course applied for.

A Home Office report published in December 2010<sup>3</sup> showed that within Tier 4 up to 14 per cent of English language college students and up to 26 per cent of students at privately funded colleges of further and higher education were potentially non compliant with the terms of their visas, compared to up to two per cent of those at university.

Since April 2011, the Home Office has introduced a series of changes to Tier 4 to reduce the scope for abuse, including tightening English language requirements, restrictions on permission to work and the right to bring dependants, and new, more stringent immigration compliance and educational quality assurance regimes. Universities have been recognised as having generally higher levels of compliance. Their students are still able to work, postgraduate students are permitted to bring dependants, and institutions have been allowed flexibility in English language testing.

Following these changes, the pilot was designed to examine the requirement for and potential effectiveness of additional interviewing and intentions testing as part of the Tier 4 application process.

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<sup>3</sup> Home Office, Overseas students in the immigration system: Types of institution and levels of study  
<http://www.ukba.homeoffice.gov.uk/sitecontent/documents/aboutus/reports/pbs-tier-4/overseas-students-report.pdf?view=Binary>

## 2 The Tier 4 credibility pilot

Under the current PBS system, Tier 4 applicants who meet the required points level are granted a visa to study in the UK. Decisions are almost always based on papers submitted as part of the application and only a small number of applicants are interviewed<sup>4</sup>. For the duration of the pilot, posts were asked to interview a larger than usual number of Tier 4 applicants and assess:

- whether an applicant could be refused a visa under the existing Tier 4 rules, or under the General Grounds for Refusal in the Immigration Rules; and
- whether a visa could potentially be refused, if an ECO had the power to refuse to grant a visa because he or she was not satisfied that the applicant was a genuine student.

ECOs did not have the power to refuse applicants they deemed to potentially lack credibility; instead they were asked to record detailed information on these cases, but still grant them a visa.

The following 14 posts took part in the pilot: Bangladesh, Burma, China, Colombia, Egypt, the Gulf, India, Kenya, Nepal<sup>5</sup>, Nigeria, Pakistan, Philippines, Sri Lanka and USA/Canada. The way applications were processed varied from post to post. Some posts already interviewed some Tier 4 applicants, whereas others (such as the Gulf) did little or no interviewing. There was also some variation in the way interviews were conducted, with some posts undertaking more telephone interviews. The number of applicants that could be interviewed face-to-face was largely dependent on resource and logistical constraints.

The Tier 4 pilot ran from 5 December 2011 to 29 February 2012<sup>6</sup>. Data was collected on 2,316 interviews. Table 1 shows the number of interviews completed in each post.

**Table 1 – Total number of interviews conducted by post and risk profile**

Post	Applications in pilot period		Interviews conducted	
	Total	% of applicants interviewed	Interviewees	% of pilot interviewees
Pakistan	3,705	19%	712	31%
India	5,271	10%	510	22%
Gulf	3,656	5%	188	8%
Nigeria	2,875	5%	147	6%
Kenya	128	91%	117	5%
Bangladesh	740	15%	109	5%
China	3,158	3%	108	5%
Philippines	190	55%	105	5%
USA/Canada	1,699	5%	84	4%
Sri Lanka	607	13%	79	3%
Egypt	220	35%	76	3%
Colombia	135	32%	43	2%
Burma	39	97%	38	2%
<b>Total</b>	<b>22,423</b>	<b>10%</b>	<b>2,316</b>	<b>100%</b>

### 2.1 Method and sampling

Interviews with high and low risk profile applicants (see section 2.2) were conducted by ECOs and data was recorded using an online survey tool. At the end of the pilot short questionnaires were sent out to posts to gather qualitative data and telephone discussions were also conducted with a selected number of posts, to further explore issues raised in applicant interviews. All data analysis was conducted by Home Office Science: Migration and Border Analysis (MBA). The target number of interviews was 2,500, based on the estimated number of applications in the pilot period and available resources in each post. Posts conducted 93 per cent (2,316) of the target, with Pakistan (712) and

<sup>4</sup> Between April 2010 and March 2011, less than one per cent of Tier 4 applicants to posts involved with the pilot were interviewed.

<sup>5</sup> Data was collected on 9 interviews in Nepal. This data was excluded from the final analysis, due to the small sample size.

<sup>6</sup> Nigeria, Kenya, Colombia and USA/Canada did not join the pilot until the week commencing 2<sup>nd</sup> January 2012.

the Philippines (105) exceeding their target number. There was an overall 61:39 split between high and low risk applicants, although some posts such as Burma, Sri Lanka, Colombia, Egypt, the Gulf and the US found it more difficult than others to achieve the target high/low risk balance because of the profile of their applicants. Full details of the methodology and sampling frame are in Appendix 1.

## 2.2 Risk profiling

Under the pilot, posts used their existing intelligence-led risk profiling processes to identify high and low risk applicants to interview. Posts were asked to provide an approximate 60:40 split between high and low risk interviewees, wherever possible<sup>7</sup>. Table 2 shows the proportion of high and low risk applicants interviewed during the pilot period in each post.

**Table 2 – Interviews by post and risk profile**

Post	High risk	Low risk	Total interviews
Bangladesh	75%	25%	109
Burma	100%	0%	38
China	57%	43%	108
Colombia	30%	70%	43
Egypt	34%	66%	76
Gulf	34%	66%	188
India	69%	31%	510
Kenya	68%	32%	117
Nigeria	57%	43%	147
Pakistan	67%	33%	712
Philippines	59%	41%	105
Sri Lanka	87%	13%	79
USA/Canada	14%	86%	84
<b>Total</b>	<b>61%</b>	<b>39%</b>	<b>2,316</b>

## 2.3 Profile of interviewees

2,316 Tier 4 applicants from a total of 47 countries were interviewed during the pilot period, with the largest proportion coming from Pakistan (31%). Table 3 shows the top ten countries of origin for interviewees. The majority of interviewees were male and aged between 21 and 29 at the time of interview (62%).

**Table 3 – Top ten countries of origin for pilot interviewees**

Country of origin	Number of interviewees	% of all interviewees
Pakistan	718	31%
India	499	22%
Nigeria	146	6%
Bangladesh	109	5%
Sri Lanka	108	5%
China	106	5%
Philippines	105	5%
USA	75	3%
United Arab Emirates	67	3%
Egypt	61	3%
All other countries of origin	322	14%
<b>Total</b>	<b>2,316</b>	<b>100%</b>

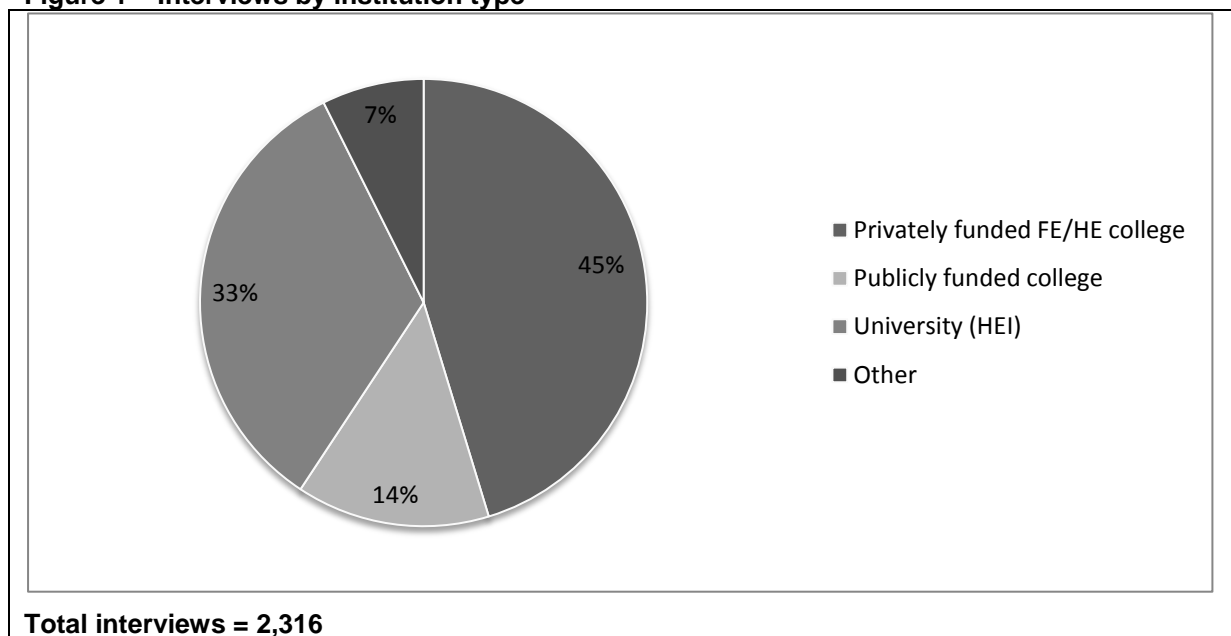
Applications were generally made to one of three institution types - privately funded FE/HE colleges (45%), publicly funded colleges (14%) or universities (33%). Course types varied, but most applied

<sup>7</sup> High risk applicants were more likely to be targeted for interviews, but it was also important to include a random sample of applicants, drawn from low risk applicants (i.e. those not normally brought to the attention of an ECO) to provide a control group, to enable full analysis of the pilot results and the impact of current risk profiling.



for business administration / management courses (28%), while 11 per cent applied to study for a Masters degree. Most applicants interviewed had applied to study for between one and two years (49%).

**Figure 1 – Interviews by institution type<sup>8</sup>**



<sup>8</sup> Due to rounding, percentages in chart may not add up to 100%.

### 3 Decisions made using existing Tier 4 PBS rules

Before assessing the impact of any new powers, it was first necessary to test how well current Tier 4 PBS rules were working to address abuse, and the value of interviewing under the existing Tier 4 framework. As part of the pilot ECOs were first asked to assess interviewees against the existing Tier 4 rules and record the outcome. Only once a decision had been made using the existing rules were ECOs permitted to apply a hypothetical credibility test.

#### 3.1 Grants and refusals

Of the 2,316 interviews conducted as part of the pilot, 1,921 (83%) were granted and 395 (17%) were refused. As might be expected, more than double the proportion of high risk applicants (22%) were refused on existing powers as low risk applicants (10%). The overall grant rate for high risk applicants was 12 percentage points lower than for low risk profiles. This suggests that the current risk profiling process in posts generally worked well and that a sizeable number of refusals could be issued using existing powers.

**Table 4 – Grant and refusal rates on existing powers, by risk profile**

Risk profile	Grant	Refusal	Total interviews
High risk	78%	22%	1,422
Low risk	90%	10%	894
<b>All risk types</b>	<b>83%</b>	<b>17%</b>	<b>2,316</b>

More than half of the pilot posts had a higher than average refusal rate on existing powers, including all posts in South Asia (Bangladesh, India, Sri Lanka).

**Table 5 – Refusal rate on existing powers by post**

Post	Grant	Refuse	Total number of interviews
Pakistan	94%	6%	712
India	71%	29%	510
Gulf	86%	14%	188
Nigeria	91%	9%	147
Kenya	82%	18%	117
Bangladesh	62%	38%	109
China	83%	17%	108
Philippines	85%	15%	105
USA/Canada	96%	4%	84
Sri Lanka	73%	27%	79
Egypt	72%	28%	76
Colombia	81%	19%	43
Burma	55%	45%	38
<b>All posts</b>	<b>83%</b>	<b>17%</b>	<b>2,316</b>

#### 3.2 Refusals after interview

It was clear that some of these refusals could have been made on papers alone (e.g. because they did not meet the current maintenance requirements). Because every applicant selected to take part in the pilot was interviewed it is not possible to provide an assessment of the exact number of applications in this category. However, the pilot data does show that many of these refusals would not have been possible had an interview not taken place. Additional interviewing using current Tier 4 powers would therefore be likely to have an impact on ECO decision making.

#### 3.3 Reasons for refusal based on existing powers

The most common reasons for refusing applicants were on the grounds of maintenance (34%), English language ability (24%) and submission of an invalid Certificate of Acceptance of Studies (CAS) (23%). Other refusal reasons were used less frequently by ECOs during the pilot.

It was very rare for ECOs to refuse on more than one existing power and refusals were relatively straightforward. If an applicant failed to meet the sufficient points level on one area their application could be refused without testing against the other criteria.

**Table 6 - Reasons for refusal on existing powers**

Refusal reason	% of refusals
Maintenance	34%
English language	24%
CAS invalid	23%
General grounds for refusal - Other than false representation	9%
General grounds for refusal - False representation (other)	8%
General grounds for refusal - False representation (maintenance)	8%
Withdrawn sponsorship	4%

Note – multiple answers were allowed for this question and so totals do not add up to 100 per cent (total number of interviewees = 395)

### 3.3.1 Refusals on maintenance and English language grounds

Of the 395 applications refused, 34 per cent (137) were refused on maintenance grounds. The highest number of maintenance refusals (23%) were made in India, and two thirds overall (66%) were for high risk applicants.

**Table 7 – High and low risk split of refusals on existing maintenance grounds, by post<sup>9</sup>**

Post	High risk	Low risk	Total applications refused on maintenance
Bangladesh	89%	11%	19
Egypt	41%	59%	17
Gulf	31%	69%	16
India	68%	32%	31
Kenya	88%	12%	17
Nigeria	50%	50%	8
Pakistan	67%	33%	9
Philippines	63%	38%	8
Sri Lanka	100%	0%	7
Other <sup>10</sup>	80%	20%	5
<b>All posts</b>	<b>66%</b>	<b>34%</b>	<b>137</b>

Refusals on maintenance grounds were generally technical, with applicants failing to provide sufficient evidence of available funds, or not being in receipt of the required funds for the mandatory 28 day period prior to applying. Others were because applicants had submitted fraudulent documentation.

Under the current system, English language ability is assessed by the sponsoring institution before applicants are issued with a CAS with some applicants required to submit a Secure English Language Test certificate with their application. More than one fifth of refusals (22%) were based on the applicant's standard of English.

### 3.3.2 Other refusal reasons

One fifth (21%) of applicants were found to have an invalid CAS. This was commonly because they had submitted invalid supporting documentation or because there were discrepancies relating to the proposed course and/or institution.

<sup>9</sup> No applications were refused on maintenance grounds in China or USA/Canada.

<sup>10</sup> Other = posts with fewer than five refusals on maintenance - Burma, Colombia

## 4 Credibility testing

The pilot enabled ECOs to consider the intentions of some applicants, but only once they had applied the existing PBS rules and decided whether to grant or refuse a visa. ECOs were then able to test the applicants to whom they had granted visas, and offer a balanced additional assessment of their applications based on:

- intention to study the proposed course;
- ability to study the proposed course;
- intention to leave the UK at the end of the course; and
- ability to accommodate and maintain themselves and any dependants.

During this pilot, ECOs did not have the power to refuse applicants they deemed to lack credibility; instead they were asked to record detailed information on those they felt they could potentially refuse on these grounds, if the power was available to them. These were hypothetical refusals, as a visa had already been granted under existing PBS rules. Discussions with posts suggest that, in reality, ECOs would be more inclined to approve than refuse an application in a borderline case. Therefore the figures provided in this section should be treated as upper estimates. In reality we would expect smaller numbers of potential refusals on credibility grounds than those captured as part of the pilot.

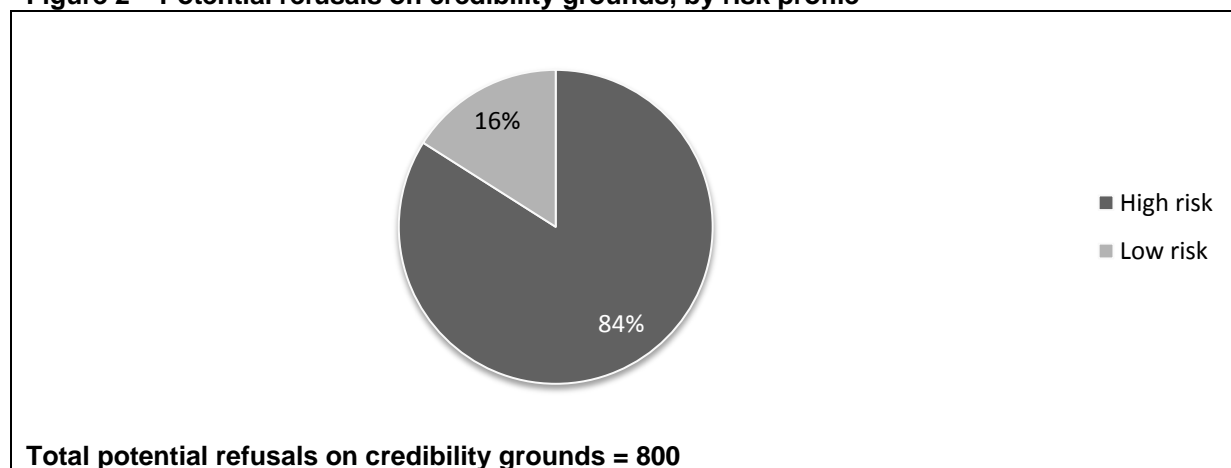
In order to obtain an accurate representation of the data, it is important when interpreting the results from the pilot to read rates and sample sizes together.

### 4.1 Decisions made using credibility testing

Of the 1,927 applicants interviewed under this pilot who were granted visas, ECOs felt they could potentially refuse up to 32 per cent on credibility grounds<sup>11</sup>.

The majority (84%) of potential refusals on credibility grounds were for high risk applicants, but most posts agreed there would be value in interviewing a small number of low risk applicants, as a quality control measure and to continue to test the effectiveness of risk profiling.

**Figure 2 – Potential refusals on credibility grounds, by risk profile**



### 4.2 Potential refusals on credibility grounds, by post

The rate of potential refusals on credibility grounds varied and seven posts (Bangladesh, Burma, India, Nigeria, Pakistan, the Philippines and Sri Lanka) had rates higher than the weighted average.

<sup>11</sup> Weighted average. Overall percentage was weighted to take into account the fact that over half of all interviews took place in India and Pakistan. The weighted percentage provides a more accurate representation of overall impact across all posts. However, this figure should not be interpreted as the additional proportion of all student applicants who might be refused following a credibility interview.

**Table 8 – Rate of potential refusals on credibility grounds, by post**

Post	Interviewees assessed on credibility	% of grants which would potentially be refused on credibility grounds
Pakistan	669	48%
India	363	59%
Gulf	162	11%
Nigeria	134	59%
Kenya	96	16%
China	90	32%
Philippines	89	53%
USA/Canada	81	0%
Bangladesh	68	59%
Sri Lanka	58	41%
Egypt	55	5%
Colombia	35	3%
Burma	21	62%
<b>Total</b>	<b>1,921</b>	<b>32%<sup>12</sup></b>

### 4.3 Potential refusals on credibility grounds, by institution and course type

Survey data show that three in five applicants (61%) to privately funded FE/HE colleges interviewed under the pilot could potentially have been refused on credibility grounds, compared with around one in seven (14%) of applicants to universities, rising to over 30 per cent in certain posts.

**Table 9 – Percentage of potential additional refusals on credibility grounds by institution type and post**

Post	Percentages				Number
	Privately funded FE/HE college	Publicly funded college	University	Other	Total potential additional refusals on credibility grounds
Pakistan	64%	16%	3%	16%	318
India	58%	17%	24%	1%	213
Nigeria	73%	10%	13%	4%	79
Philippines	70%	26%	4%	0%	47
Bangladesh	53%	38%	10%	0%	40
China	59%	7%	34%	0%	29
Sri Lanka	42%	13%	42%	4%	24
Gulf	44%	17%	11%	28%	18
Kenya	67%	7%	27%	0%	15
Burma	46%	23%	31%	0%	13
Other <sup>13</sup>	0%	0%	25%	75%	4
<b>All posts</b>	<b>61%</b>	<b>17%</b>	<b>14%</b>	<b>8%</b>	<b>800</b>

<sup>12</sup> Weighted average. Overall percentage was weighted to take into account the unrepresentative nature of the sample. The weighted percentage provides a more accurate representation of overall impact across all posts.

<sup>13</sup> Posts with fewer than ten potential refusals on credibility grounds – Egypt, Colombia.

The rate of potential refusals on credibility grounds was more than three times higher amongst applicants to privately funded FE/HE colleges (58%) than applicants to universities (16%).

**Table 10 – Rate of potential refusals on credibility grounds per institution type**

<b>Institution type</b>	<b>% of interviewees, who could potentially be refused on credibility grounds</b>	<b>Total number of interviewees assessed on credibility grounds</b>
Privately funded FE/HE	58%	852
Publicly funded FE/HE	51%	268
University	16%	664
Other	48%	137
<b>All institution types</b>	<b>42%</b>	<b>1,921</b>

The largest number of additional potential refusals arose from applications for business administration and management courses (310 out of 800 potential additional refusals). During the pilot, rates of potential refusals on credibility grounds were high for diplomas (56%), business/administration courses (48%) and banking/finance related courses (42%) - particularly those offered by private colleges.

**Table 11– Percentage of potential refusals on credibility grounds, by course and institution type**

<b>Course type</b>	<b>Percentages</b>				<b>Number</b>
	<b>Privately funded FE/HE college</b>	<b>Publicly funded FE/HE college</b>	<b>University</b>	<b>Other</b>	<b>Total additional applications that might be refused on credibility</b>
Business admin/management	75%	11%	11%	3%	310
HND/HNC	41%	45%	1%	13%	69
Health and social care	53%	38%	8%	3%	40
Diploma	90%	3%	0%	8%	39
ACCA	71%	0%	9%	20%	35
English language	63%	13%	0%	23%	30
Computing/IT related courses	68%	20%	12%	0%	25
Masters degree	8%	12%	72%	8%	25
MBA	32%	16%	52%	0%	25
Banking/finance related courses	77%	0%	14%	9%	22
ABE (Association of Business Executives)	29%	47%	6%	18%	17
Foundation course	31%	6%	63%	0%	16
Undergraduate degree	38%	15%	46%	0%	13
Other	54%	20%	10%	16%	134
<b>Total</b>	<b>61%</b>	<b>17%</b>	<b>14%</b>	<b>8%</b>	<b>800</b>

The data did not suggest any strong relationship between course length and the potential credibility of applicants.

#### **4.4 Potential refusals on credibility grounds, by interview type**

Face-to-face interviewing was found to be the most effective way of assessing potential credibility, but more than one quarter (26%) of applicants were interviewed over the telephone as part of the pilot. The data show that there was a higher potential refusal rate when applicants were interviewed face-to-face, as opposed to over the telephone.

Telephone interviews appear to be less effective in judging credibility and ECOs had concerns about the credibility of 21 per cent fewer telephone interviewees than face-to-face interviewees. Data suggests that ECOs found it more difficult to judge potential credibility over the telephone and were

therefore less likely to issue a potential refusal on credibility grounds in those situations. There were problems confirming the identity of telephone interviewees and also concerns in some cases that the interviewee was receiving assistance from a third party when responding to ECO questions.

**Table 12 - Could interviewee potentially be refused on credibility grounds? By interview type**

Interview type	No	Yes	Total interviewees
Face-to-face	52%	48%	1367
Telephone	73%	27%	529
Interview type not stated	100%	0%	25
<b>All interview types</b>	<b>58%</b>	<b>42%</b>	<b>1,921</b>

## 4.5 Reasons for potential refusals on credibility grounds

Assessments of applicants' potential credibility were more subjective than the current PBS decision making process. ECOs were required to consider all aspects of credibility to create a rounded judgement.

The largest proportion of potential refusals on credibility grounds were based on a combination of three factors (36%). Of these, the most common combination of reasons given by ECOs involved applicants' intention to study the course, intention to leave the UK at the end of their course and their ability to study the course (22%).

**Table 13 – Number of factors on which potential refusals on credibility grounds were based**

Number of factors	Total	% of total
1	90	11%
2	240	30%
3	291	36%
4	181	23%
<b>Total</b>	<b>800</b>	<b>100%</b>

Data showed that the two most important elements of credibility for potential refusals under the pilot were intention to study (88% of cases) and intention to leave the UK (85%). Students' ability to study (52%) and maintain themselves (47%) were considered factors in around half of all potential refusals on credibility grounds.

**Table 14 – Reasons for potential refusal on credibility grounds**

Reason	Total	% of potential refusals
Intention to study the proposed course	700	88%
Applicant's intention to leave the UK at the end of their course	681	85%
Ability to study the proposed course	416	52%
Applicant's ability to accommodate and maintain themselves and any dependants	375	47%
<b>Total potential refusals on credibility grounds</b>	<b>800</b>	

Note – multiple answers were allowed for this question and so totals do not add up to 100 per cent.

India and the Philippines had a higher than average proportion of potential refusals on the combination of intentions to study and their intention to leave the UK.

**Table 15 – Percentage of potential refusals on credibility grounds by factor and by post**

Post	Percentages				Number
	Intention to study the proposed course	Intention to leave the UK	Ability to study the proposed course	Maintenance	Total applicants
Pakistan	93%	97%	62%	37%	318
India	90%	81%	44%	56%	213
Nigeria	81%	81%	52%	78%	79
Bangladesh	85%	55%	33%	85%	40
Philippines	81%	87%	26%	21%	47
Sri Lanka	96%	100%	79%	42%	24
China	69%	34%	69%	3%	29
Burma	92%	92%	38%	77%	13
Kenya	73%	80%	60%	7%	15
Gulf	44%	83%	28%	17%	18
Other <sup>14</sup>	75%	25%	25%	50%	4
<b>All posts</b>	<b>88%</b>	<b>85%</b>	<b>52%</b>	<b>46%</b>	<b>800</b>

#### 4.5.1 Intention to study

Intention to study was a particularly important aspect of potential credibility and was referred to in 88 per cent of potential credibility refusals. Data collected from interviews with applicants identified the following potential factors in assessing intention to study:

- poor academic background including any elongated gaps in study;
- applicants lacking in knowledge of course and institution and awareness of alternatives;
- level of course applied for, and academic progression offered; and
- suspicious reasons for choosing a particular course or institution, including undue influence from family, friends and agents.

The majority of potential refusals related to intention to study were for high risk applicants (86%).

**Table 16 – Potential refusals involving intention to study as a factor, by post and risk profile**

Post	Total number of potential refusals on intention to study	
	High risk	Low risk
Pakistan	91%	9%
India	76%	24%
Nigeria	84%	16%
Philippines	100%	0%
Bangladesh	94%	6%
Sri Lanka	91%	9%
China	65%	35%
Burma	100%	0%
Kenya	73%	27%
Other <sup>15</sup>	82%	18%
All posts	86%	14%

<sup>14</sup> Posts with fewer than ten interviewees (Colombia, Egypt)

<sup>15</sup> Posts with fewer than ten interviewees (Colombia, the Gulf, Egypt)



### 4.5.2 Intention to leave the UK at the end of the course

Intention to leave the UK was referred to in 85 per cent of potential refusals on credibility grounds (an intention to stay in the UK legitimately was not a factor in these considerations). Data collected from applicant interviews highlighted the following factors as considerations in assessing intention to leave the UK:

- individual's economic circumstances (push and pull factors);
- applicant's plans on completion of studies;
- ties with the UK, including friends and family; and
- ties with their home country, including family and business interests.

**Table 17 – Potential refusals involving intention to leave the UK at the end of the course as a factor, by post**

Post	High risk	Low risk	Total potential refusals on intention to leave the UK
Pakistan	91%	9%	307
India	72%	28%	173
Nigeria	86%	14%	64
Philippines	95%	5%	41
Sri Lanka	92%	8%	24
Bangladesh	95%	5%	22
Gulf	73%	27%	15
Burma	100%	0%	12
Kenya	75%	25%	12
China	80%	20%	10
Egypt	100%	0%	1
<b>All posts</b>	<b>85%</b>	<b>15%</b>	<b>681</b>

### 4.5.3 Maintenance

There is already a requirement under Tier 4 to demonstrate adequate maintenance funds for the first nine months of a course, or the full course length if shorter. The pilot data suggests that ECOs would like additional powers to test applicants' financial backgrounds and source of funding. Interviews highlighted the following issues in relation to some applicants:

- applicants being unable to give a credible explanation of the source of funds or how they would meet course and maintenance costs in future years;
- suspicion that money for the course was provided by an agent or other third party;
- an applicant's level of income did not equate to the cost of the proposed course;
- doubts over whether funds could be accessed in the UK; and
- the applicant's bank account was opened a short time before the application was made and had no history of money regularly coming in.

**Table 18 – Potential credibility refusals involving maintenance as a factor, by post (all risk profiles)**

<b>Post</b>	<b>High risk</b>	<b>Low risk</b>	<b>Total potential refusals on maintenance grounds</b>
India	80%	20%	119
Pakistan	92%	8%	118
Nigeria	79%	21%	62
Bangladesh	91%	9%	34
Burma	100%	0%	10
Philippines	100%	0%	10
Sri Lanka	90%	10%	10
Other <sup>16</sup>	42%	58%	12
<b>All posts</b>	<b>86%</b>	<b>14%</b>	<b>375</b>

Increased interviewing and credibility testing could enable ECOs to assess whether applicants have sufficient funds to support themselves throughout the duration of their course and to question them about the source of their funds.

#### **4.5.4 Ability to study the proposed course**

Ability to study is an important test of potential credibility, but one that posts feel is best judged by the sponsoring institution. ECOs expressed the view that the onus should remain on them to do so.

Applicants to privately funded FE/HE colleges (65%) were nearly twice as likely to be potentially refused on their ability to study a course as applicants to any other institution type (34%). Universities were generally seen to be better at judging the academic ability of applicants than some privately funded colleges, leading to greater confidence in their ability to complete their course.

**Table 19 – Potential refusals involving ability to study the proposed course as a factor, by institution (all posts and risk profiles)**

<b>Institution type</b>	<b>% of potential refusals on ability to study the proposed course</b>	<b>Total interviewees</b>
Privately funded FE/HE	65%	272
Publicly funded FE/HE	19%	78
University (HEI)	8%	35
Other	7%	31
<b>Total</b>	<b>100%</b>	<b>416</b>

A number of potential refusals involving ability to study the proposed course as a factor cited the applicant's inability to answer basic questions in English without an interpreter. It is possible these cases could have been refused under existing PBS rules.

## **4.6 Overall impact of interviews and credibility testing under the pilot**

The pilot data suggest that up to a maximum of 44 per cent of applicants interviewed under the pilot could potentially have been refused, had a credibility test been available in conjunction with additional interviewing under the current PBS process. Table 19 shows the data by post. The pilot demonstrated that the impact of increased interviewing combined with credibility testing could potentially be highest in India, Nigeria, Pakistan, Sri Lanka, Burma and the Philippines.

The interviewee sample developed for the pilot was not representative of the entire student applicant population and therefore the figures in Table 19 should be read as upper estimates. In reality the

<sup>16</sup> Posts with fewer than ten potential refusals involving maintenance as a factor (China, Egypt, the Gulf, Kenya).

overall rates of refusal after interview would be expected to be considerably lower than the pilot data suggests.

**Table 20 – Potential overall impact of interviewing and credibility testing under the pilot by post**

<b>Post</b>	<b>Percentages</b>			<b>Number</b>
	<b>Refusal rate of those interviewed under the pilot on existing powers (%)</b>	<b>Maximum potential additional credibility refusal rate for those granted under the pilot under existing powers (%)</b>	<b>Potential maximum refusal rate of those interviewed under the pilot – refusals on existing powers and potential credibility refusals combined<sup>17</sup> (%)</b>	<b>Total interviews (number)</b>
Pakistan	6%	48%	51%	712
India	29%	59%	71%	510
Gulf	14%	11%	23%	188
Nigeria	9%	59%	63%	147
Kenya	18%	16%	31%	117
Bangladesh	38%	59%	74%	109
China	17%	32%	44%	108
Philippines	15%	53%	60%	105
USA/Canada	4%	0%	4%	84
Sri Lanka	27%	41%	57%	79
Egypt	28%	5%	32%	76
Colombia	19%	3%	21%	43
Burma	45%	62%	79%	38
<b>All posts</b>	<b>17%</b>	<b>32%<sup>18</sup></b>	<b>44%</b>	<b>2,316</b>

<sup>17</sup> Total refusals on existing powers and potential refusals on credibility grounds against total number of interviews in each post.

<sup>18</sup> Weighted average. Overall percentage was weighted to take into account the fact that over half of all interviews took place in India and Pakistan. The weighted percentage provides a more accurate representation of overall impact across all posts.

## 5 Interview process

Interviews were either conducted face-to-face or over the telephone. ECOs were provided with a basic template to use when interviewing applicants, but were given flexibility to deviate from this as they saw fit. ECOs were requested to conduct interviews in the native language of the applicant, but also to ask some questions to determine the applicant's English language ability.

### 5.1 Interview type and length

The majority of interviews (73%) were conducted face-to-face by ECOs. Face-to-face interviews were seen as preferable to telephone interviews as they enabled ECOs to assess body language and the ease with which applicants answered questions. Posts found it difficult in many cases to confirm the identity of telephone interviewees and were not always able to judge whether an applicant had received assistance in answering questions. However, in some cases ECOs found that telephone interviews were the only practical option – for example:

- in countries with a large geographical area (e.g. China), it can be expensive and impractical for applicants to travel to the embassy for a face-to-face interview;
- some applicants are not permitted to cross borders to attend a face-to-face interview in a different country; and
- in some lower risk posts such as the Gulf, telephone interviews were deemed more appropriate, given the low risk of applicants.

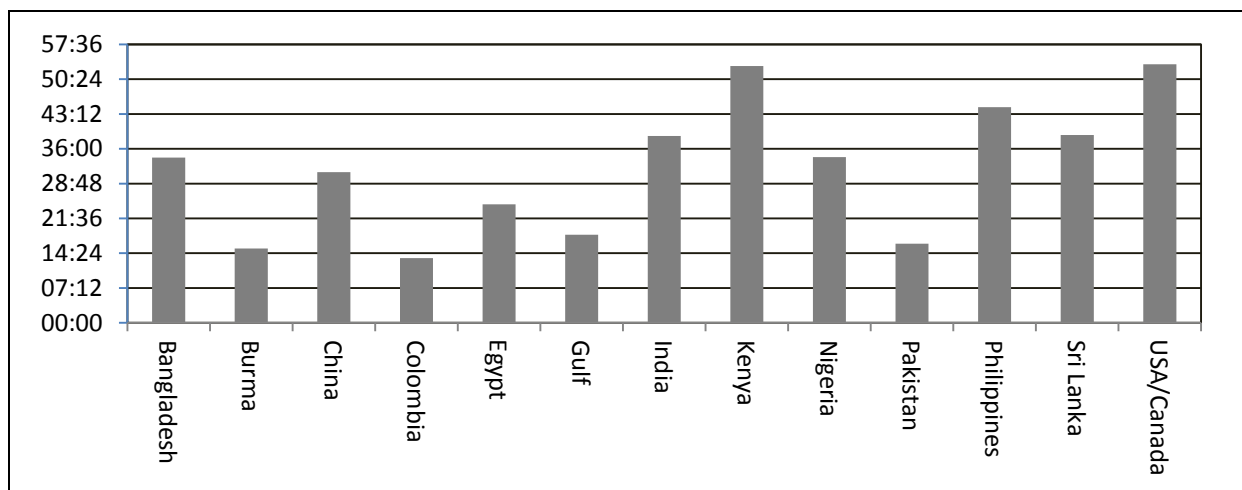
**Table 21 – Interview type by post (all risk types)**

Post	Percentages			Number
	Face-to-face	Telephone	Interview type not recorded	Total number of interviews
Bangladesh	97%	1%	2%	109
Burma	100%	0%	0%	38
China	70%	28%	2%	108
Colombia	67%	33%	0%	43
Egypt	75%	14%	11%	76
Gulf	7%	91%	2%	188
India	87%	11%	1%	510
Kenya	58%	42%	0%	117
Nigeria <sup>19</sup>	1%	99%	0%	147
Pakistan	99%	1%	0%	712
Philippines	61%	37%	2%	105
Sri Lanka	95%	3%	3%	79
USA/Canada	0%	100%	0%	84
<b>All posts</b>	<b>73%</b>	<b>26%</b>	<b>1%</b>	<b>2,316</b>

Telephone interviews generally took longer than face-to-face interviews. ECOs used the same template for all interviews and tried to replicate a face-to-face interview as closely as possible. However, they found it took time to establish the identity of telephone interviewees in many cases, thus making interviews longer. The longest interviews were conducted in the USA/Canada, due in part to the fact that all interviews were conducted over the telephone. ECOs also felt that applicants in the USA/Canada were all highly knowledgeable about their subjects and very keen to talk about them. ECOs felt that longer interviews with applicants could have a negative impact on the productivity of posts and reduce the amount of applications they are able to process each day.

<sup>19</sup> Almost all interviews in Nigeria were conducted over the telephone, as interview space at the embassy in Abuja was limited, due to the closure of the embassy building in Lagos as a result of terrorist action.

**Figure 3 – Average interview length, by post**



As expected, posts reported an increase in the time taken to process applications. In Pakistan, it was estimated by ECOs that during the pilot it took up to four to five times longer than normal to process applications and in South Asia and the Gulf it was estimated that the process took up to a third longer than normal. Some ECOs expressed concerns that extended processing times may have a negative impact on the availability of resources and productivity of posts. No data were collected on the level of extra resources or funding required for additional interviewing.

## 6 Appendix 1 – Methodology

### 6.1 Sampling

#### 6.1.1 Target Number of interviews

Home Office Science: Migration and Border Analysis (MBA) designed a sample to achieve a total of between 2,000 and 2,500 interviews from posts. The final breakdown of target number of interviews in each post was based on the following information:

- size of post;
- volume of applications 1 December 2010 to 28 February 2011;
- expected volume of applications 1 December 2011 to 29 February 2012; and
- estimated number of interviews posts were able to conduct in the pilot period.

#### 6.1.2 Random and non random sample

High risk applicants were more likely to be targeted for interviews, but it was also important to interview a random sample of applicants, drawn from low risk applicants (i.e. those not normally brought to the attention of an ECO) to provide a control group to enable full analysis of the pilot and the impact of current risk profiling. The final sample target asked posts to interview on a 60:40 high:low risk split wherever possible. .

#### 6.1.3 Sample selection

Table 22 shows the target number of interviews for each post, per month, split by high and low risk, and the actual number of applicants interviewed. The target sample was amended during the pilot in response to fluctuations in application numbers.

Posts conducted 93 per cent of the overall target number of interviews, with Pakistan and the Philippines exceeding their targets. There was an overall 62:38 split between high and low risk applicants, but some posts such as Burma, Sri Lanka, Colombia, Egypt, the Gulf and the US found it more difficult than others to achieve the target high/low risk balance because of the profile of their applicants.

**Table 22 – Target interviews, by post and risk profile, against actual interviews**

Post	Target			Actual			
	High risk	Low risk	Total	High risk	Low risk	Total	% of target
Bangladesh	75	45	120	82	27	109	91%
Burma	25	15	40	38	0	38	95%
China	90	60	150	62	46	108	72%
Colombia	45	25	70	13	30	43	61%
Egypt	75	45	120	26	50	76	63%
Gulf	120	80	200	63	125	188	94%
India	350	210	560	351	159	510	91%
Kenya	80	40	120	80	37	117	98%
Nepal	6	4	10	9	0	9	90%
Nigeria	150	100	250	84	63	147	59%
Pakistan	300	200	500	480	232	712	142%
Philippines	60	40	100	62	43	105	105%
Sri Lanka	90	60	150	69	10	79	53%
USA /Canada	70	40	110	12	72	84	76%
<b>Total</b>	<b>1,536</b>	<b>964</b>	<b>2,500</b>	<b>1,431</b>	<b>894</b>	<b>2,325</b>	<b>93%</b>

## 6.2 Country specific guidance

Once the sample strategy was developed, each post was provided with bespoke guidance, detailing weekly targets.

## 6.3 Data collection tool

Data on interviews conducted in posts was collected using an online survey tool. This was the most accessible way for posts to record data and enabled quick, detailed and ongoing analysis by MBA, as well as ensuring consistency of data. This method is regularly used by MBA to conduct quantitative and qualitative surveys.

Survey questions covering details of the student, their place of study, and the outcomes of interviews were developed by MBA, Home Office Migration Policy and UK Border Agency international posts. Staff in posts were required to complete the survey for every applicant they interviewed. Routing was built into the survey, to direct ECOs to the relevant questions, based on their responses. All data collected was anonymised and no individual applicant or ECO was referred to in the final report.

## 6.4 Qualitative research

In addition to interview data captured, MBA conducted qualitative research with staff in posts. This included a range of telephone discussions and responses to specific questions from participating posts to give additional data on ECOs' views on the operation of the pilot and a number of post-specific issues. Topics explored included:

- how student applications were processed as part of the pilot;
- the operation of the pilot;
- the impact credibility testing had on the role of ECOs; and
- views on the impact of interviewing and the requirement for any new powers of refusal.

Four posts were selected to take part in telephone discussions:

- Colombia;
- The Gulf;
- Pakistan; and
- South Asia;

These posts/regions were selected as particular areas of interest for the pilot. South Asia and Pakistan represented the highest volume of applications and interviews, while ECOs in The Gulf and Colombia had low levels of refusals under the pilot.

**Table 23 – Countries and staff selected for focus groups and interviews**

Post/region	Interview or focus group	Number of participants	Job title of participants
South Asia	Interview	1	Operations Manager
Pakistan	Focus group	3	2 x Entry Clearance Officers Entry Clearance Manager
Gulf	Focus group	2	2 x Entry Clearance Officers
Colombia	Interview	1	Entry Clearance Manager

A summary of the data collected through the qualitative research is at Appendix 4.

## 7 Appendix 2 – Country profiles of potential refusals on credibility grounds

Please note – due to rounding, percentages in tables may not equal exactly 100%.

### Bangladesh

<b>Potential refusals on credibility grounds</b>		40
<b>Average age</b>		24
<b>Sex</b>	Male	90%
<b>Risk profile</b>	High risk	90%
<b>Course type</b>	Business admin/management	30%
<b>Course length</b>	6 months to 1 year	55%
<b>Institution type</b>	Privately funded FE/HE college	53%
<b>Refusal reason(s)</b>	Maintenance	33%
	Intention to study	33%
	Intention to leave	21%
	Ability to study	13%

### Burma

<b>Potential refusals on credibility grounds</b>		13
<b>Average age</b>		22
<b>Sex</b>	Male	54%
<b>Risk profile</b>	High risk	100%
<b>Course type</b>	Foundation course	31%
<b>Course length</b>	6 months to 1 year	62%
<b>Institution type</b>	Privately funded FE/HE college	46%
<b>Refusal reason(s)</b>	Intention to study	31%
	Intention to leave	31%
	Maintenance	26%
	Ability to study	13%

### China

<b>Potential refusals on credibility grounds</b>		29
<b>Average age</b>		23
<b>Sex</b>	Female	55%
<b>Risk profile</b>	High risk	55%
<b>Course type</b>	Business admin/management	28%
<b>Course length</b>	6 months to 1 year	34%
	1 year to 2 years	34%
<b>Institution type</b>	Privately funded FE/HE college	59%
<b>Refusal reason(s)</b>	Intention to study	39%
	Ability to study	39%
	Intention to leave	20%
	Maintenance	2%



### Colombia

<b>Potential refusals on credibility grounds</b>	1	
<b>Average age</b>	26	
<b>Sex</b>	Female	100%
<b>Risk profile</b>	High risk	100%
<b>Course type</b>	Other	100%
<b>Course length</b>	Less than 6 months	100%
<b>Institution type</b>	Other	100%
<b>Refusal reason(s)</b>	Intention to study	100%
	Intention to leave	0%
	Maintenance	0%
	Ability to study	0%

### Egypt

<b>Potential refusals on credibility grounds</b>	3	
<b>Average age</b>	30	
<b>Sex</b>	Male	100%
<b>Risk profile</b>	High risk	67%
<b>Course type</b>	Business admin/management	33%
	English language	33%
	Other	33%
<b>Course length</b>	6 months to 1 year	100%
<b>Institution type</b>	Other	67%
<b>Refusal reason(s)</b>	Intention to study	33%
	Maintenance	33%
	Intention to leave	17%
	Ability to study	17%

### Gulf

<b>Potential refusals on credibility grounds</b>	18	
<b>Average age</b>	25	
<b>Sex</b>	Male	72%
<b>Risk profile</b>	High risk	72%
<b>Course type</b>	Other	56%
<b>Course length</b>	1 to 2 years	44%
<b>Institution type</b>	Privately funded FE/HE college	44%
<b>Refusal reason(s)</b>	Intention to leave	48%
	Intention to study	26%
	Ability to study	16%
	Maintenance	10%

### India

<b>Potential refusals on credibility grounds</b>	213	
<b>Average age</b>	24	
<b>Sex</b>	Male	81%
<b>Risk profile</b>	High risk	76%
<b>Course type</b>	Business admin/management	54%
<b>Course length</b>	1 to 2 years	55%
<b>Institution type</b>	Privately funded FE/HE college	58%
<b>Refusal reason(s)</b>	intention to study	33%
	intention to leave	30%
	Maintenance	21%
	Ability to study	16%

### Kenya

<b>Potential refusals on credibility grounds</b>	15	
<b>Average age</b>	23	
<b>Sex</b>	Male	60%
<b>Risk profile</b>	High risk	80%
<b>Course type</b>	Business admin/management	47%
<b>Course length</b>	1 to 2 years	47%
<b>Institution type</b>	Privately funded FE/HE college	67%
<b>Refusal reason(s)</b>	Intention to leave	36%
	Intention to study	33%
	Ability to study	27%
	Maintenance	3%

### Nigeria

<b>Potential refusals on credibility grounds</b>	79	
<b>Average age</b>	27	
<b>Sex</b>	Male	68%
<b>Risk profile</b>	High risk	78%
<b>Course type</b>	Business admin/management	29%
<b>Course length</b>	1 to 2 years	51%
<b>Institution type</b>	Privately funded FE/HE college	73%
<b>Refusal reason(s)</b>	Intention to leave	28%
	Intention to study	28%
	Maintenance	27%
	Ability to study	18%

### Pakistan

<b>Potential refusals on credibility grounds</b>	318	
<b>Average age</b>	24	
<b>Sex</b>	Male	88%
<b>Risk profile</b>	High risk	91%
<b>Course type</b>	Business admin/management	40%
<b>Course length</b>	1 to 2 years	61%
<b>Institution type</b>	Privately funded FE/HE college	64%
<b>Refusal reason(s)</b>	Intention to leave	33%
	Intention to study	32%
	Ability to study	21%
	Maintenance	13%

### Philippines

<b>Potential refusals on credibility grounds</b>	47	
<b>Average age</b>	29	
<b>Sex</b>	Female	64%
<b>Risk profile</b>	High risk	96%
<b>Course type</b>	Health and social care	62%
<b>Course length</b>	6 months to 1 year	45%
<b>Institution type</b>	Privately funded FE/HE college	70%
<b>Refusal reason(s)</b>	Intention to leave	41%
	Intention to study	38%
	Ability to study	12%
	Maintenance	10%

### Sri Lanka

<b>Potential refusals on credibility grounds</b>	24	
<b>Average age</b>	26	
<b>Sex</b>	Male	67%
<b>Risk profile</b>	High risk	92%
<b>Course type</b>	Business admin/management	50%
<b>Course length</b>	1 to 2 years	50%
<b>Institution type</b>	Privately funded FE/HE college	42%
	University	42%
<b>Refusal reason(s)</b>	Intention to leave	32%
	Intention to study	30%
	Ability to study	25%
	Maintenance	13%

## 8 Appendix 3 - Case studies

This section provides some examples of data recorded by ECOs, showing reasons for potential refusals on credibility grounds.

### Case study 1:

<b>Post</b>	India
<b>Nationality</b>	Indian
<b>Age range</b>	18 to 20
<b>Risk profile</b>	High risk
<b>Institution type</b>	Privately funded FE/HE college
<b>Course type</b>	Business admin/management
<b>Interview type</b>	Face-to-face
<b>Credibility factors</b>	Intention to study the course Intention to leave the UK at the end of the course Ability to study the course Maintenance
<b>Interview notes</b>	<p>Lack of knowledge or evidence of research about the course and the educational establishment leads me to doubt the intention to study the proposed course.</p> <p>When asked about elements of the course, failure to provide anything beyond a basic answer leads me to doubt the ability to study the course.</p> <p>Lack of concrete plans for further studies/employment on return to India leads me to doubt intention to leave UK at end of course.</p> <p>Lack of evidence of provenance of funds / not commensurate with parents stated employment and income leads me to doubt that stated funds are genuinely available to applicant; this leads me to doubt applicant's ability to accommodate and maintain.</p>

**Case study 2:**

<b>Post</b>	India
<b>Nationality</b>	Indian
<b>Age range</b>	21 to 29
<b>Risk profile</b>	Low risk
<b>Institution type</b>	University
<b>Course type</b>	Computing/IT related courses
<b>Interview type</b>	Face-to-face
<b>Credibility factors</b>	Intention to study the course Intention to leave the UK
<b>Interview notes</b>	<p>Two previous working holiday visa refusals, both appeals were dismissed.</p> <p>Last studies in 2006, has been helping family in agriculture since then.</p> <p>Unable to name a single module on the course despite proposing to spend over seven years of his family's income on this course.</p> <p>Uncle is funding, supports five people.</p> <p>Did not research any other colleges/universities or courses.</p>

**Case study 3:**

<b>Post</b>	India
<b>Nationality</b>	Indian
<b>Age range</b>	30 to 39
<b>Risk profile</b>	High risk
<b>Institution type</b>	Privately funded FE/HE college
<b>Course type</b>	Banking/finance related course
<b>Interview type</b>	Face-to-face
<b>Credibility factors</b>	Ability to study the course Maintenance
<b>Interview notes</b>	<p>Applicant has not studied for nine years - is married with child and has now decided to travel to the UK and study.</p> <p>Has a degree in India and is proposing to study a level 5 course in the UK.</p> <p>Large fund deposits into bank accounts - no evidence where this money has come from, was deposited just before application and held for 28 days</p>

**Case study 4:**

<b>Post</b>	Pakistan
<b>Nationality</b>	Pakistani
<b>Age range</b>	30 to 39
<b>Risk profile</b>	High risk
<b>Institution type</b>	Publicly funded FE/HE college
<b>Course type</b>	Other (Extended Diploma In Strategic Management & Leadership)
<b>Interview type</b>	Face-to-face
<b>Credibility factors</b>	Intention to study Intention to leave the UK Ability to study
<b>Interview notes</b>	Applicant walked into the interview room with a sheet of paper with all the subjects and course content (highlighted).  Spoke very little English.  Unable to state the course name.

**Case study 5:**

<b>Post</b>	Pakistan
<b>Nationality</b>	Pakistani
<b>Age range</b>	21 to 29
<b>Risk profile</b>	High risk
<b>Institution type</b>	Privately funded FE/HE
<b>Course type</b>	Diploma
<b>Interview type</b>	Face-to-face
<b>Credibility factors</b>	Intention to study Intention to leave the UK Ability to study
<b>Interview notes</b>	Not credible.  Was not able to state the chosen course or the name of the college.  He resigned from a job he held for four years to go to UK.  He claims he has 37laks rupees and still got a loan for his studies.



**Case study 6:**

<b>Post</b>	Pakistan
<b>Nationality</b>	Pakistani
<b>Age range</b>	21 to 29
<b>Risk profile</b>	High risk
<b>Institution type</b>	Privately funded FE/HE college
<b>Course type</b>	Business admin/management
<b>Interview type</b>	Face-to-face
<b>Credibility factors</b>	Intention to study the course Intention to leave the UK at the end of the course Ability to study the course Maintenance
<b>Interview notes</b>	<p>The applicant has limited knowledge of the course, his future prospects or what he intends to do after it.</p> <p>He appeared to only choose the college due to having his aunt in the UK.</p> <p>Added to this he has not studied since 2009 and has provided no plausible reason why he has decided to return to education now.</p> <p>It lacks credibility that he would spend such a significant amount of money on a course he knows very little about.</p>

**Case study 7:**

<b>Post</b>	China
<b>Nationality</b>	Chinese
<b>Age range</b>	21 to 29
<b>Risk profile</b>	High risk
<b>Institution type</b>	Privately funded FE/HE
<b>Course type</b>	Business admin/management
<b>Interview type</b>	Face-to-face
<b>Credibility factors</b>	Intention to study Intention to leave the UK Ability to study
<b>Interview notes</b>	<p>Applicant is 22 years old wanting to study a low level (NQF Level 3) course at a "high risk" college.</p> <p>The CAS states studying a Business, Finance and Management Foundation but appears to want to study Hospitality.</p> <p>Applicant stated the college was chosen because she has low scores.</p> <p>Applicant states she wants to go to University but no conditional offer in place.</p> <p>Applicant graduated from high school in 2008 and has been working in her father's business for past three years and now wants to go to UK to study.</p>

**Case Study 8:**

<b>Post</b>	Nigeria
<b>Nationality</b>	Nigerian
<b>Age range</b>	30 to 39
<b>Risk profile</b>	High risk
<b>Institution type</b>	Privately funded FE/HE college
<b>Course type</b>	HND/HNC
<b>Interview type</b>	Telephone
<b>Credibility factors</b>	Intention to study the course Intention to leave the UK at the end of the course Ability to study the course Maintenance
<b>Interview notes</b>	<p>Applicant did not have any knowledge of his course. When he was asked what his course subjects were he stated that he does not know.</p> <p>He did not know what he would be taught and stated that he would learn once he gets there. This puts doubts on the applicant's ability to study and his intention to study the course.</p> <p>Applicant stated that the only reason he chose that college was because it was owned by a Nigerian. He has not researched on the college. This puts doubts on his intention to leave the UK.</p> <p>The applicant does not have a clear idea of his career plans. He states that he wants be a computer analyst however could not clearly state why he wants to study Human Resource management. He stated that he wants to learn this subject as he wants to start his own business.</p>

**Case Study 9:**

<b>Post</b>	Gulf
<b>Nationality</b>	Pakistani
<b>Age range</b>	21 to 29
<b>Risk profile</b>	Low risk
<b>Institution type</b>	Publicly funded college
<b>Course type</b>	HND/HNC
<b>Interview type</b>	Telephone
<b>Credibility factors</b>	Intention to study the course Intention to leave the UK at the end of the course
<b>Interview notes</b>	<p>Applicant last studied A-levels in 2004 in maths, chemistry and physics and now intends to study creative media production.</p> <p>Has a two year old child (and husband) who is a GBR national and who she states will not travel with her. She states the child is old enough to be alone (without his mother).</p> <p>She picked her course as it was the cheapest and did an internet search to find it. She has only ever worked for a short period as a teacher and since then has been a homemaker.</p> <p>Although she indicated that she believed she could easily find a job in the UAE as a result of the course, my suspicion is that she intends to live in the UK with her child, as a student and that her primary reason for undertaking a course is to obtain leave without having to go through the settlement process which would require her husband to be present and settled.</p>

## 9 Appendix 4 – Benefits and challenges of increased interviewing and credibility testing

Posts identified what they perceived to be the main benefits of increased interviewing and credibility testing, but were also wary of some of the associated challenges. Table 24 shows the main benefits and challenges identified by posts.

**Table 24 – Benefits and challenges of increased interviewing and credibility testing**

<b>Benefits</b>	<b>Challenges</b>
Would allow refusals not possible under existing powers and give stronger grounds for refusal. ECOs believe that this would lead to fairer and better evidenced decisions.	There are resource and time implications to consider, especially for high volume posts and in peak seasons. This will put pressure on staff and impact on productivity.
Makes it easier for ECOs to judge the applicant's long term intentions and knowledge of courses and institutions.	Important to make sure that scheduling of interviews does not delay the start of courses for applicants
Credibility testing is key to identifying poorer quality applicants and sponsoring institutions and complements improvements already made to Tier 4 route.	Face-to-face interviews are not always possible, especially in smaller spoke posts, reporting into a bigger hub. Telephone interviews may limit the impact of credibility testing.
Face-to-face interviews allow ECOs to assess the applicant's body language and comfort at answering their questions. This is important for judging credibility.	Danger that answers to interview questions would quickly be circulated to other applicants, reducing the value of interviews/testing.
Interviews are the most effective way of assessing the English language ability of applicants.	There is a danger that some of objectivity of PBS decisions will be lost and more decisions could be challenged. This could be mitigated by requiring interviews to ensure more comprehensive evidence is gathered from the applicant, but this has significant resource implications.

Posts also identified a number of further issues, including:

- the way in which sponsors were fulfilling their current duty to test ability and intention to study;
- the need for sufficient flexibility for different posts to target additional testing according to need; and
- the potential for allowing more documentation to be submitted by applicants at the entry clearance stage, to provide ECOs with more information on which to make a decision.